

**ORIGINAL**

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Mailing Online Service )

Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS: DANIEL STIREWALT  
(OCA/USPS-T3-43-45)  
(October 1, 1998)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby incorporated by reference.

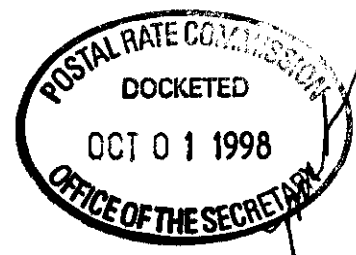
Respectfully submitted,

*Gail Willette*

Gail Willette  
Acting Director  
Office of the Consumer Advocate

*Emmett Rand Costich*

Emmett Rand Costich  
Acting Assistant Director



OCA/USPS-T3-43. Please refer to USPS-LR-1/MC98-1, Attachment 1, at page 6, in the column "YR 1999 Estimate."

- a. Please confirm that the figure, 5,981, is expressed in units of "users." If you do not confirm, please show the derivation of the proper units.
  - b. Please confirm that the figure, 12, is expressed in units of "sessions/user/yr." If you do not confirm, please show the derivation of the proper units.
  - c. Please confirm that the figure, 230.04, is expressed in units of "sessions/business day." If you do not confirm, please show the derivation of the proper units.
  - d. Please confirm that the figure, 0.75, is a pure number with no associated units. If you do not confirm, please show the derivation of the proper units.
  - e. Please confirm that the figure, 172.53, is expressed in units of "sessions/business day." If you do not confirm, please show the derivation of the proper units.
  - f. Please confirm that the figure, 0.5, is expressed in units of "hours." If you do not confirm, please show the derivation of the proper units.
  - g. Please confirm that the figure, 4, is expressed in units of "hours." If you do not confirm, please show the derivation of the proper units.
  - h. Please confirm that the figure, 21.57, is expressed in units of "sessions/business day." If you do not confirm, please show the derivation of the proper units.
  - i. Please confirm that the figure, 0.01, is expressed in units of "(sessions/business day)/sec." If you do not confirm, please show the derivation of the proper units.
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- j. Please confirm that the figure, 3.2, is expressed in units of “pages/piece.” If you do not confirm, please show the derivation of the proper units.
- k. Please confirm that the figure, 5,020, is expressed in units of “bytes/page (PDF).” If you do not confirm, please show the derivation of the proper units.
- l. Please confirm that the figure, 4,120, is expressed in units of “pieces/session.” If you do not confirm, please show the derivation of the proper units.
- m. Please confirm that the figure, 200, is expressed in units of “bytes/piece.” If you do not confirm, please show the derivation of the proper units.
- n. Please confirm that the figure, 839,964.69, is expressed in units of “bytes/session.” If you do not confirm, please show the derivation of the proper units. Please confirm that you use the same size address file for both mail merge and non-mail merge jobs at this point in the capacity analysis. If you do not confirm, please explain.
- o. Please confirm that the figure, 10,063.76, is expressed in units of “(bytes/business day)/sec.” If you do not confirm, please show the derivation of the proper units.

OCA/USPS-T3-44. Please refer to USPS-LR-1/MC98-1, Attachment 1, at page 7, in the column “YR 1999 Estimate.”

- a. Please confirm that the figure, 30,720, is expressed in units of “bytes/page (Postscript).” If you do not confirm, please show the derivation of the proper units.

- b. Please confirm that the figure, 49, is expressed in units of "(pieces/business day)/sec." If you do not confirm, please show the derivation of the proper units.
- c. Please confirm that the figure, 1,516,231, is expressed in units of "(((pieces/business day)/sec. \* (bytes/page (Postscript))))." Please confirm that the correct units should be "(bytes (Postscript)/business day)/sec." If you do not confirm, please show the derivation of the proper units.
- d. Please confirm that the formula used to calculate the figure 1,516,231 should contain the multiplicative term 3.2 pages per piece. If you do not confirm, please explain.


OCA/USPS-T3-45. Please refer to USPS-LR-1/MC98-1, Attachment 1, at page 7 and 8, in the column "YR 1999 Estimate."

- a. Please confirm that the figure, 10, is expressed in units of "print sites." If you do not confirm, please show the derivation of the proper units.
- b. Please confirm that the figure, 295,665,000, is expressed in units of "pieces/year." If you do not confirm, please show the derivation of the proper units.
- c. Please confirm that the figure, 947,644, is expressed in units of "pieces/business day." If you do not confirm, please show the derivation of the proper units.
- d. Please confirm that the figure, 0.5, is a pure number with no associated units. If you do not confirm, please show the derivation of the proper units.
- e. Please confirm that the second figure, 0.5, is a pure number with no associated units. If you do not confirm, please show the derivation of the proper units.

- f. Please confirm that the figure, 0.15, is a pure number with no associated units.  
If you do not confirm, please show the derivation of the proper units.
- g. Please confirm that the figure, 1.15721E+15, is expressed in units of  
“(pieces/business day) \* (bytes/page (Postscript)) \* (sessions/business day) \*  
(bytes/page (Postscript)).” Please confirm that the proper units are  
“bytes/business day.” If you do not confirm, please show the derivation of the  
proper units.
- h. Please confirm that the figure, 8.67905E+14, is expressed in units of  
“(pieces/business day) \* (bytes/page (Postscript)) \* (sessions/business day) \*  
(bytes/page (Postscript)).” Please confirm that the proper units are  
“bytes/business day.” If you do not confirm, please show the derivation of the  
proper units.
- i. Please confirm that the figure, 6,027,115,280, is expressed in units of  
“(pieces/business day) \* (bytes/page (Postscript)) \* (sessions/business day) \*  
(bytes/page (Postscript))/(seconds/print site).” Please confirm that the proper  
units are “bytes/business day/sec./print site.” If you do not confirm, please show  
the derivation of the proper units.

# CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

  
Emmett Rand Costich  
Attorney

Washington, D.C. 20268-0001  
October 1, 1998